

Exhibit A

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION	No. 2:12-md-02323-AB
	MDL No. 2323
THIS DOCUMENT RELATES TO:	Hon. Anita B. Brody
ALL ACTIONS	

**CO-LEAD CLASS COUNSEL'S REPLY BRIEF IN SUPPORT OF MOTION TO
PROHIBIT IMPROPER COMMUNICATIONS WITH THE CLASS**

Co-Lead Class Counsel's Motion to Prohibit Improper Communications with the Class requested that MoloLamken, LLP should be ordered either to take down the website, www.nflconcussionsettlementfacts.com or submit an affidavit declaring under penalty of perjury that none of the lawyers from that firm, or its co-counsel, had any involvement with the registering, maintaining or providing content to that website, and that their clients have been instructed to remove any links to the firm's website. In response, MoloLamken, on behalf of its seven clients, without acknowledging who was responsible for the creation of the website, contend that because the website has been deactivated, the motion has become moot.

By taking the action to shut down the website, MoloLamken implicitly acknowledged the impropriety of the website. Plainly, it was improper for these counsel on behalf of or through their clients to communicate with absent class members in a manner that was not judicially approved, and far outside the bounds of being neutral, truthful and accurate statements regarding the settlement. Since these inappropriate communications with the class through the counterfeit

website have been eliminated, Co-Lead Class Counsel agree that the prospective risks concerning the subject website have become moot. Nonetheless, Co-Lead Class Counsel continue to evaluate the impact of the misinformation disseminated through www.nflsettlementfacts.com on absent class members as pertains to class members' decisions to opt out or object, and will present such further detail to the Court at the appropriate time. Given these past infractions, Co-Lead Class Counsel intend to continuously monitor for communications with absent class members conducted by MoloLamken, Ms. Mullinex and Hangley Aronchick, Segal, Pudlin & Schiller, to verify that no further improper communications occur.

Dated: October 31, 2014

Respectfully submitted,

/s/ Christopher A. Seeger

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